

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

NATALIE CAMPAGNA, GLORIA DEVAULT,
AMANDA FARMER, PHILIP PAGLIARO, and
YAAKOV ROZINER, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

TD BANK, N.A.,

Defendant.

Case No. 1:20-cv-18533-KMW-SAK

UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT

COME NOW Plaintiffs, by and through their undersigned counsel, and hereby respectfully move the Court, pursuant to Federal Rule of Civil Procedure 23, for an order (1) preliminarily approving the parties' class settlement; (2) certifying the settlement class; (3) appointing Plaintiffs as class representatives and their counsel as class counsel; (4) approving the notice program; and (5) scheduling the final approval hearing. The motion is not opposed by Defendant.

The motion is based on the memorandum of law in support, the parties' settlement agreement and all exhibits thereto (Exhibit 2 to the memorandum of law), the joint declaration of E. Adam Webb and G. Franklin Lemond, Jr. and all exhibits thereto (filed simultaneously herewith), and all pleadings and filings in this action.

As set forth more fully in the memorandum of law, the requested relief is appropriate because (1) the parties' settlement is fair, adequate, and reasonable and meets all requirements for preliminary approval as articulated by the Third Circuit and Rule 23(e)(2), (2) the requirements of Rule 23(a) and (b)(3) are met and thus certification of the settlement class is

warranted, and (3) the proposed notice program satisfies due process and Rule 23(e). For the Court's convenience, a proposed order is filed herewith.

DATED this 25th day July, 2022.

Respectfully submitted,

BY: GOLOMB SPIRT GRUNFELD, P.C.

/s/ Kenneth J. Grunfeld

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CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which shall send notification of such filing to all counsel of record.

/s/ Kenneth J. Grunfeld

Kenneth J. Grunfeld